

# EXHIBIT 2

Case Clip(s) Detailed Report

**Oklahoma Trial Sept 2009**

Sunday, November 08, 2009, 4:08:48 PM

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**83. PAGE 55:06 TO 55:18 (RUNNING 00:00:52.999)**

06 A. Talking about poultry litter?  
07 Q. (Mr. Riggs continued.) Well, we'll talk on that  
08 later but I'll let you use your term for now, poultry  
09 litter.  
10 A. The grower owns it.  
11 Q. From the time Peterson started using contract  
12 growers to produce its chickens, has the grower always  
13 owned the litter produced in the growing of the chickens?  
14 A. As far as I know, yes.  
15 Q. Has Peterson ever imposed any restrictions in its  
16 contracts regarding how poultry litter is to be managed  
17 and disposed of, other than those we've just talked about?  
18 A. It's required a Litter Management Plan for several

**84. PAGE 55:19 TO 55:19 (RUNNING 00:00:02.000)**

19 years.

**85. PAGE 56:14 TO 56:17 (RUNNING 00:00:15.999)**

14 Q. Okay. Are any of those terms regarding how payment  
15 is to be calculated negotiated with the grower?  
16 A. No.  
17 Q. So the grower couldn't negotiate a different method

**86. PAGE 56:18 TO 56:24 (RUNNING 00:00:17.000)**

18 of payment?  
19 A. No.  
20 Q. Could he negotiate the price he's charged for the  
21 feed?  
22 A. No. All growers are charged the same amount.  
23 Q. They don't negotiate that amount?  
24 A. No.

**87. PAGE 57:05 TO 57:08 (RUNNING 00:00:14.999)**

05 Q. (Mr. Riggs continued.) Okay. He can't negotiate  
06 who owns the dead chickens, can he?  
07 A. No.  
08 Q. He can't negotiate the ingredients in his feed?

**88. PAGE 57:09 TO 57:14 (RUNNING 00:00:17.000)**

09 A. No.  
10 Q. Can he negotiate who has responsibility for the  
11 poultry litter produced in the growing operation?  
12 A. No.  
13 Q. Has that ever been negotiated with any grower?  
14 A. It's -- not to my knowledge, no.

<b>TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 00:39:50.737)</b>
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